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Joanne Salvatore Bochis
Associate General Counsel

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SEP 20 1993

September 20, 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: 800 Data Base Access Tariffs and
the 800 Service Management System
Tariff

CC Docket No. 93-129

Dear Mr. Caton:

Enclosed herewith for filing with the Commission are the original
and four copies of the National Exchange Carrier Association,
Inc.'s Direct Case in the above-captioned matter.

Please acknowledge receipt hereof by affixing a notation on the
duplicate copy of this letter furnished herewith for such
purposes and remitting same to bearer.

Very truly yours,


Joanne S. Bochis

JSB/bas
Enclosures

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SEP 20 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

800 Data Base Access Tariffs
and the 800 Service Managements
System Tariff

CC Docket No. 93-129

DIRECT CASE

National Exchange Carrier Association, Inc.
100 South Jefferson Road
Whippany, NJ 07981
(201) 884-8160

September 20, 1993

SUMMARY

NECA shows in this Direct Case that its 800 Data Base Service Tariff is in compliance with the Communications Act and with the Commission's Orders in CC Docket No. 86-10. The claims of some petitioners in this proceeding that certain terms and conditions contained in the 800 Data Base Service Tariffs were not clear do not pertain to NECA's tariff.

In this Direct Case, NECA has demonstrated that its tariff language is unambiguous in the description and application of basic query service and the provision of vertical features. To ensure proper applicability of NECA's Tariff F.C.C. No. 5 query rates, NECA required member companies to put in a designated office type code in Tariff F.C.C. No. 4.

Since no EC tariff participants are SCP owners, NECA's lawful rate development was based on rates prepared by SCP owners and third party transport providers. The calculation of NECA's 800 Data Base Service rates was conducted in accordance with Commission's rules and the rates were updated to reflect reductions made by GTE, Pacific Bell and United Telephone. Responses to the Bureau's data questions contained in Appendices A and B of the Designation Order and additional worksheets have been provided to support the current 800 data base query charge. NECA also states that it did not use a computer model to develop its rates.

For these reasons, the Common Carrier Bureau should find NECA's 800 Data Base Tariff lawful and permit the current rates and terms and conditions to remain in effect.

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ATTACHMENTS

1. Designation Order - Appendix A Questions
- 1A. Appendix B-2 of the Designation Order
- 2-2A. June 1993 NECA Access Charge Filing
Worksheets-Revised Supporting the
800 Data Base Query Charge

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In the Matter of)
)
800 Data Base Access Tariffs) CC Docket No. 93-129
and the 800 Service Managements)
System Tariff)

DIRECT CASE

The National Exchange Carrier Association, Inc. (NECA) submits its Direct Case in response to the Commission's Designation Order in the above-captioned proceeding.¹ This Direct Case demonstrates that the NECA 800 Data Base Service rates and rate structure were reasonable and developed consistent with the Commission's rules.

I. BACKGROUND

In compliance with Commission orders regarding the implementation of the 800 Data Base system,² NECA filed its 800 Data Base Service tariff revisions to NECA's Tariff F.C.C. No. 5 under Transmittal No. 540 on March 5, 1993. This filing added terms and conditions and proposed rates applicable to NECA ECs' provision of 800 Data Base Service on a per query basis, to become effective May 1, 1993.

¹ 800 Data Base Access Tariffs and the 800 Service Management System Tariff, Order Designating Issues for Investigation, CC Docket No. 93-129, (DA 93-930) rel. July 19, 1993 (Designation Order).

² See Provision of Access for 800 Service, CC Docket No. 86-10, Second Report and Order, 8 FCC Rcd 907 (1993) (January 29 800 Access Service Order); Order, 8 FCC Rcd 1423 (1993) and Memorandum Opinion and Order, 8 FCC Rcd 1402 (1993).

The new 800 Data Base system is based on the deployment of the signalling system 7 network which, among other things, carries signalling for 800 traffic. This signalling network interacts with several regional databases, called Service Control Points (SCPs), which contain customer records and routing instructions for each 800 number. When an 800 call is placed, it is held at the Service Switching Point (SSP) until a query can be sent to, and routing instructions received from, the SCP.

NECA currently has no tariff participants that are SCP owners. Some ECs covered under NECA's tariff have local exchange switches equipped with SSP capability. These ECs are able to send a query over the SS7 network to one of the regional SCPs. Other ECs do not have SS7 capabilities and therefore must forward a query to a switch that has SS7 interconnection capabilities. On April 8, 1993, NECA revised its 800 Data Base Service Tariff filing, through Transmittal No. 548, to add language that allowed ordering of trunks for 800 Data Base Access Service at designated non-SSP equipped end offices that could accommodate direct trunking of originating 800 calls.

Although both of NECA's transmittals were challenged, none of the petitioners provided adequate substantiation for a suspension

or investigation of NECA's rates.³ On April 28, 1993, the Common Carrier Bureau, however, issued an order to institute an investigation into various EC 800 Data Base Service filings including NECA's Transmittal Nos. 540 and 548.⁴ The Bureau decided to suspend and investigate the 800 Data Base query tariffs of both those ECs owning SCPs and those that do not own SCPs because they "raise[d] significant questions of lawfulness regarding cost allocations, resulting rate levels, and terms and conditions."⁵

The Common Carrier Bureau subsequently issued its Designation Order and requested that the designated ECs, including NECA, respond to a series of questions related to the 800 Data Base Tariff filing terms and conditions and rate development for both rate of return and price cap carriers. Although many of the questions are not directly applicable to NECA's pooling members,

³ See NECA's Reply to various Petitions to Reject and/or Suspend and Investigate NECA's Tariff F.C.C. No. 5 Transmittal No. 540, filed on April 1, 1993. In this Reply at 4, NECA demonstrated that Petitioners had either stated simply that NECA's rates were too high without meeting the Commission's requirements for specificity and support; confused NECA with price cap companies; or failed to even mention NECA specifically, just making oblique references to other carriers filing 800 Data Base query charge tariffs. See also NECA's Reply to General Communication, Inc.'s Petition to Reject, or in the Alternative, Suspend and Investigate NECA's Tariff F.C.C. No. 5 Transmittal No. 548, filed April 21, 1993. GCI's Petition took exception to the use of the word "or" instead of "and" in NECA's tariff language. In its April 21 Reply at 4, NECA stated that NECA's original language met both the FCC's and GCI's intent; but that if the Commission ordered the language to be changed, NECA would comply.

⁴ See The Bell Operating Companies' Tariff for the 800 Service Management System, Tariff F.C.C. No. 1 and 800 Data Base Access Tariffs, Order, 8 FCC Rcd 3242 (1993) (800 Data Base Access Tariff Order).

⁵ 800 Data Base Access Tariff Order at ¶ 16.

NECA has responded below to the Bureau's questions concerning tariff terms and conditions and the rate of return issues associated with the 800 Data Base query tariffs.⁶ Through these responses, NECA demonstrates that its 800 Data Base Service rates are lawful and should remain in effect unchanged.

II. ISSUES DESIGNATED FOR INVESTIGATION AND NECA'S RESPONSES

A. TERMS AND CONDITIONS

Issue 1: The degree of clarity with which the EC 800 data base tariffs describe the services offered. Under this issue, the Commission invites comments on whether terms and conditions are consistent with the Communications Act and with the Commission's Orders in CC Docket No. 86-10. **Subissue:** Should the ECs include the RESPORG services in their 800 data base tariffs?

NECA RESPONSE: NECA's 800 Data Base Service Tariff is in compliance with the Communications Act and with the Commission's Orders in CC Docket No. 86-10. In its Designation Order, the Bureau cited many petitioners' claims concerning terms and conditions contained in the 800 Data Base Service Tariffs. These declarations that certain terms and conditions are not clear do not pertain to NECA's tariff.

For example, the Bureau repeated petitioners' claims that some ECs' tariffs failed to state clearly that basic 800 query service included area of service routing at the LATA level.⁷ NECA's Tariff F.C.C. No. 5 at Section 6.1.3(A)(3) states:

⁶ See Designation Order at ¶¶ 6-7 and 34-38.

⁷ Id. at ¶ 6.

The Basic Query provides the identification of the customer to whom the call will be delivered and includes area of service routing which allows routing of 800 calls by telephone companies to different interexchange carriers (IXCs) based on the Local Access Transport Area (LATA) in which the call originates.

NECA believes this tariff description is clear in regard to area of service routing at the LATA level.

Section 6.1.3(C)(3) of NECA's Tariff F.C.C. No. 5 addresses the Bureau's concern that ECs may not clearly describe when an EC may charge for a query when the associated call is not delivered to the interexchange carrier (IXC). This tariff language which can also be found in Section 6.4.1(C)(8) states:

A Basic or Vertical Feature Query charge . . . is assessed for each query launched to the data base which identifies the customer to whom the call will be delivered.

NECA's tariff specifies that the charge is only applicable after a query of the 800 data base has been launched, and the IXC customer to whom the call is to be delivered has been identified. In its January 29 800 Access Service Order, the Commission stated that "LECs may charge IXCs for completed queries even if the LEC never actually delivers the associated call to the IXC" and concluded that "[i]f a LEC incurs the cost of a completed 800 data base query on behalf of an IXC customer, that as a matter of economic efficiency, the associated IXC should be responsible for covering those costs."¹ In accordance with that Commission Order, NECA has clearly stated in its tariff that the query charge will occur when the query has been launched and the IXC has been identified.

¹ January 29 800 Access Service Order, 8 FCC Rcd at 909.

In addition, the NECA tariff has no references to the marketing of vertical features and therefore cannot be construed as permitting ECs to market vertical features directly to end users, in contravention of the Commission's Orders in CC Docket No. 86-10.⁹ NECA drew its language concerning vertical features contained in Section 6.1.3(C)(3) directly from the Commission's Orders in CC Docket No. 86-10.¹⁰

NECA has not included references to RESPORGS in its Tariff F.C.C. No. 5 because none of the ECs concurring in NECA's tariff are currently RESPORGS. Since NECA has not been involved in this issue, it is not addressing questions associated with it in its Direct Case.

B. 800 Data Base Query Tariffs - Rate of Return Carriers

Issue 4 **Rate of Return ECs' Role in Providing Their Services Offered in Their Tariffs.** The Bureau invited parties to address whether the originating EC may properly establish tariffed charges for the query service when the neighboring EC who provides this service also had charges for the service in its tariff.

NECA RESPONSE: NECA's Tariff F.C.C. No. 5 in Section 6.4.1(C)(8) states that:

Query charges ... will only be applied by those companies whose wire centers are identified as assessing query charges

⁹ See Bureau's discussion in Designation Order at ¶ 6 and note 9.

¹⁰ Compare NECA's tariff language in Section 6.1.3(C)(3) of its Tariff F.C.C. No. 5 with the Commission's description of vertical features in the January 29 800 Access Service Order, 8 FCC Rcd at 907.

in the National Exchange Carrier Association, Inc. Tariff F.C.C. No. 4.

To support these tariff provisions, NECA has instructed member companies that they should be included as billing ECs in Tariff No. 4 in those instances where they have been assessed a query charge by either the data base owner or by a connecting carrier, which they then must pass on to a customer.

Because of the various billing configurations available in the 800 Data Base network, NECA member companies may or may not render bills for the 800 data base query. NECA's tariff allows for either the non-SSP end office telephone company or the SSP company to bill for the query.

If a NECA EC owns an SSP and launches a query to the 800 data base, that EC will generally be assessed a charge by the SCP owner. The EC would either assess the tariffed query charge to the customer to whom the 800 call is delivered or pass the charge on to a connecting EC. In the first instance, this EC would have the correct designation in Tariff F.C.C. No. 4.

If a NECA EC does not own an SSP, that EC must enter into an arrangement with a company that does own an SSP. The EC and SSP owner must decide who will assess the query charge. When an EC is assessed a query charge by an SSP owner, that EC (with the proper designation in Tariff F.C.C. No. 4) will in turn apply its tariffed query charge to whomever the 800 call is delivered. When an EC is not assessed a query charge by an SSP owner, that EC (who does not appear in Tariff F.C.C. No. 4 with the aforementioned 800 query designation) will not bill the tariffed query charge.

NECA was very careful to devise an unambiguous method to determine which EC is responsible for billing the query charge to the customer.¹¹ The Tariff No. 4 designation assists any industry representative in such a determination.

Issue 5 Query and Vertical Features Rate development.
Subissue A: Do these tariffs properly flow through changes in EC costs of providing basic query service and vertical features.

NECA RESPONSE: NECA revised its tariff on May 10, 1993, (Transmittal No. 553), because of reductions by the GTE Telephone System Companies, Pacific Bell and United Telephone Company. These revised rates became effective on May 11, 1993. NECA revised its tariff on June 29, 1993, (Transmittal No. 561) because of reductions by the United Telephone Company, Pacific Bell and GTE. These revisions became effective on July 2, 1993. NECA has fully reflected changed rate levels of SCP providers and, as with other expense changes, will update its data to include any SCP rate level changes and reflect corresponding new 800 Data Base Service rates in its next Annual Access Tariff Filing.

Subissue B: Have the rate of return ECs properly stated the demand on which their query rates are based? ECs must demonstrate that adjustments to demand based on number of unbillable queries are warranted and that their demand estimates are reasonable.

NECA RESPONSE: NECA completed the Designation Order Appendix A questions which are included here as Attachment 1. Attachment 1A

¹¹ See NECA Tariff Transmittal No. 542 which revises Tariff F.C.C. No. 4 to add the Office Type Code of "HD" for 800 Query Charge Billing Location.

is page Appendix B-2 of the Designation Order which is the Information Request spreadsheet for 800 Data Base Service Costs required by the Bureau.¹² Revised worksheets supporting the current 800 data base query charge are enclosed with this Direct Case (See Attachments 2 and 2A). These worksheets display modifications to the worksheets that were filed on June 29, 1993 (Transmittal No. 561). These modifications reflect data corrections that did not impact the rates.

There are two types of queries. The first type involves an SSP query that receives an SCP response identifying a customer without available access facilities. In this case, SCP owners will bill the SSP; and the SSP will bill the customer even though the call cannot be delivered.¹³ NECA did not include any allowance for unbillable queries of this type in its rate development.¹⁴

The second type involves an 800 number that is not assigned to a customer. The SCP response to the SSP query indicates that it is an unassigned number. SCP owners will not bill the SSP for this type of query. Independent Telecommunications Network, Inc. (ITN), a third party provider, does bill the SSP a transport rate of \$.007, for all queries, including queries for unassigned numbers.¹⁵

¹² Page B-1 of the spreadsheet is not included because it is not applicable to NECA.

¹³ See discussion on page 5 supra.

¹⁴ NECA believes that these are legitimate costs, and reserves the right to include these costs in future filings if it becomes impractical to bill these types of queries to customers.

¹⁵ See Attachment 2A.

To recover ITN's charges to the SSP, NECA added a 5 percent cost expansion factor to ITN's rate in its rate development calculation. As a result, the overall rate impact from unbillable queries is 1.9 percent.

Issue 6 Reasonableness of CCSCIS Cost Allocation. ECs that used computer models to develop investment-based costs in their direct cases must disclose those models on the record if their justification for their rates was based on the model.


NECA RESPONSE: NECA did not use a computer model to develop its rates. The rates were developed based on rates prepared by SCP owners and third party providers. NECA has not included any specific SSP investment-based costs of EC tariff participants in its rates.

III. CONCLUSION

In this Direct Case, NECA has demonstrated that its 800 Data Base Service rates and terms and conditions are reasonable and lawful. NECA's tariff language is unambiguous in the description and application of basic query service and the provision of vertical features. NECA has explained how an EC concurring in its Access Service Tariff must be designated in Tariff F.C.C. No. 4 to be considered a provider of 800 Data Base Services.

The development of NECA's 800 Data Base Service rates was conducted in accordance with Commission's rules and the rates were updated to reflect reductions in SCP owner tariff rates. For these reasons, the Common Carrier Bureau should find NECA's 800 Data Base Tariff lawful and permit the current rates, as well as terms and conditions, to remain in effect.

Respectfully submitted,
National Exchange Carrier Association, Inc.


Joanne Salvatore Bochis

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Its Attorney

September 20, 1993

DESIGNATION ORDER - APPENDIX A QUESTIONS
(NECA RESPONSES UNDERLINED)

1. For 800 data base service, provide the demand level used in your cost calculations.

See Appendix B-2 Spreadsheet which is Attachment 1A to this Direct Case.

2. If in calculating your costs, you lowered your demand estimate to compensate for unbillable queries, thereby increasing your costs, provide the percent by which you lowered demand.

NECA did not adjust the demand to account for unbillable queries. See NECA Response to Direct Case Issue 5 Subissue B for an explanation of how unbillable queries were included in the NECA rate development.

3. Explain and justify your rationale for the factor used to decrease demand for your ratemaking calculations.

Not applicable.

4. Provide the name of the SCP provider for your query service.

See Direct Case Attachments 2 and 2A.

5. Provide the name of the SCP provider for your query service.

See Direct Case Attachments 2 and 2A.

6. Did your SCP provider(s) revise rates since your original rate calculations?

Yes, certain SCP providers have revised its rates since NECA's original March 5, 1993 filing. Transmittal No. 540.

7. If your SCP provider(s) revised rates, have you revised your rates to reflect the change in your costs?

Yes, NECA revised its rates on May 10, 1993, Transmittal No. 553 and again on June 29, 1993, Transmittal No. 561.

8. If you use two or more SCP providers and develop a composite query cost, explain how the composite is calculated for inclusion in your rates.

NECA's rates for 800 Data Base are based on a demand weighted nationwide average of the charges incurred by Traffic Sensitive pooling companies. The NECA pool query demand for each SCP was multiplied by the basic query rate for that SCP. The incremental rate difference between a basic query and a vertical query was multiplied by the vertical feature demand for each SCP owner. The average SCP basic query costs are the result of dividing the sum of the products of each company's basic rate and their query demand by the total pool query demand. The incremental per query cost of vertical features is developed by dividing the sum of the products of their vertical feature incremental charge and each SCP owners vertical feature demand by the total NECA pool vertical feature demand. The average SCP vertical feature cost per query is equal to the basic query cost plus the incremental vertical feature cost.

9. If you use a transport provider, provide the name and per query rate assessed by that provider.

Independent Telecommunications Network, Inc. (ITN) - \$.007 per query. NECA added a modest cost expansion factor of 5 percent to account for unbillable queries. See Direct Case at Issue 5, Subissue B. NECA has confirmed with ITN that actual July and August data supports the rate of unbillable queries at approximately 5 percent.

In Alaska, traffic sensitive pooling ECs utilize an Alascom/United network to access the United SCP. The Alascom portion of the network is treated by NECA as a transport provider. The actual contract rate (which was finalized after NECA's 800 query rate tariff filing) for provision of both query and transport to NECA pooling ECs is \$.0292 per query. NECA's estimate that Alascom would assess \$.023 per query, in addition to the SCP owner's rate of \$.00619 was therefore accurate.

10. Provide worksheets showing all relevant data and calculations.

See Direct Case Attachments 2 and 2A.

11. Include and justify any other costs incurred to provide 800 service.

No other costs were used in developing the 800 query rates.

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
II. Jurisdictional Separations	Land Acct 2111	Buildings Acct 2121	General Purpose Computers Acct 2124	Analog Switching Acct 2211	Digital Switching Acct 2212	Radio System Acct 2231	Circuit Equipment Acct 2232	Other Terminal Equipment Acct 2362	Poles Acct 2411	Aerial Cable Acct 2421	Underground Cable Acct 2422	Buried Cable Acct 2423	IntraBldg Network Cable Acct 2426	Aerial Wire Acct 2431	Conduit Systems Acct 2441	Total

STP/SCP Signalling Link

Total Investment																
Total Company																
Subject to Separation																
State 800 Database																
State Other																
Inter state 800 Database																
Inter state Other																

Method of Assignment

Local STP/Regional STP Signalling Link

Total Investment																
Total Company																
Subject to Separation																
State 800 Database																
State Other																
Inter state 800 Database																
Inter state Other																

Method of Assignment

Tandem Switch

Total Investment																
Total Company																
Subject to Separation																
State 800 Database																
State Other																
Inter state 800 Database																
Inter state Other																

Method of Assignment

SSP

Total Investment																
Total Company																
Subject to Separation																
State 800 Database																
State Other																
Inter state 800 Database																
Inter state Other																

Method of Assignment

III. Demand

A
Total

800 Database Queries

State 800 Database	N/A
State Other	N/A
Inter state 800 Database	424081635
Inter state Other	N/A
Unbillable Query Factor	0.019

JUNE 1993 NECA ACCESS CHARGE FILING – REVISED
800 DATA BASE QUERY CHARGE

	SCP Provider A	MONTHLY Interstate 800 Queries B	Per Query BASIC Rate C	TOTAL BASIC COSTS D = B x C	VERTICAL % E	Per Query VERTICAL Rate F	Vertical Less Basic Query Rate G = F – C	MONTHLY VERTICAL 800 Queries H = B x E	Additional VERTICAL COSTS I = G x H
1	AM – 1	3,619,739	\$0.00220	\$7,963	60.50%	\$0.00240	\$0.00020	2,189,942	\$438
2	AM – 2	2,011,822	\$0.0012	\$2,414	60.50%	\$0.00140	\$0.00020	1,217,152	\$243
3	BA	4,962,797	\$0.00309	\$15,330	30.00%	\$0.00342	\$0.00033	1,488,839	\$487
4	BS	8,184,085	\$0.00390	\$31,918	18.00%	\$0.00415	\$0.00025	1,473,135	\$368
5	GTE	2,870	\$0.00670	\$19	28.00%	\$0.00670	\$0.00000	804	\$0
6	NYNEX	325,608	\$0.00419	\$1,363	1.99%	\$0.00689	\$0.00271	6,480	\$18
7	SWB	1,995,330	\$0.00160	\$3,193	15.50%	\$0.00189	\$0.00029	309,276	\$90
8	USW	3,573,252	\$0.00350	\$12,506	4.00%	\$0.00419	\$0.00069	142,930	\$99
9	UTS (AVG)	2,177,101	\$0.00619	\$13,476	3.00%	\$0.00754	\$0.00135	65,313	\$88
10	SNET	2,147,845	\$0.00440	\$9,451	10.00%	\$0.00575	\$0.00135	214,785	\$290
11	PAC	494,460	\$0.00528	\$2,611	2.00%	\$0.00540	\$0.00012	9,889	\$1
12	TOTAL (Ln 1 Thru Ln 11)	29,494,909		\$100,244				7,118,545	\$2,122
Average Per Query Data Base Costs:									
13	SCP Basic Cost (Col. D Ln 12 / Col. B Ln 12)				\$0.003399				
14	Incremental Vertical Feature Cost (Col. I Ln 12 / Col. H Ln 12)				\$0.000298				
15	Total SCP Vertical Feature Cost (Ln 13 + Ln 14)				\$0.003697				

JUNE 1993 NECA ACCESS CHARGE FILING – REVISED
800 DATA BASE QUERY CHARGE

	Third Party Transport A	Monthly Interstate 800 Queries B	800 Transport Per Query Costs C	Total Cost D = B x C
1	ITN	11,884,112	\$0.00735	\$87,307
2	SDN	453,143	\$0.000	\$0
3	INS	2,016,080	\$0.000	\$0
4	MEANS	1,830,828	\$0.000	\$0
5	ALASKA	1,400,614	\$0.023	\$32,214
6	TOTAL (Ln 1 Thru Ln 5)	17,584,777		\$119,521
7	Total Pool Queries (EXH. 1, Col. B Ln 12)			29,494,909
8	Average Third Party Cost per Pool Query (Col. D Ln 6 / Ln 7)			\$0.004052
NECA Pool Rate Development:				
9	Average SCP Cost Per Basic Query (EXH. 1, Ln 13)			\$0.003399
10	Average SCP Cost Per Vertical Query (EXH. 1, Ln 15)			\$0.003697
11	Basic Query Rate (Ln 8 + Ln 9)			\$0.0075
12	Vertical Query Rate (Ln 8 + Ln 10)			\$0.0077
Revenue Calculation:				
		Basic	Vertical	
13	1991 Total Annual Queries	268,516,368	85,422,539	
14	1993/1994 Test Period (7.5% Growth)	321,730,271	102,351,364	
15	Test Period Revenues	\$2,412,977	\$788,106	